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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

ASHLEY KOENEKE,

Plaintiff,

v.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 2:24-cv-01006-JDP

**STIPULATION AND ~~PROPOSED~~ ORDER
FOR VOLUNTARY REMAND**

IT IS HEREBY STIPULATED, by and between the parties, through their undersigned attorneys, and with the approval of the Court, that the Commissioner of Social Security has agreed to a voluntary remand of this case pursuant to sentence four of 42 U.S.C. § 405(g). The purpose of the remand is to offer Plaintiff a new decision. The parties agree that no specific aspect of the Commissioner's final decision is affirmed.

On remand, the Commissioner will offer Plaintiff the opportunity for a hearing; develop the record as necessary; and issue a new decision. The parties further request that the Clerk of the Court be

1 directed to enter a final judgment in favor of Plaintiff, and against Defendant, reversing the final decision
2 of the Commissioner. Plaintiff's motion for summary judgment, ECF No. 9, is denied as moot.
3

4 Date: August 28, 2024

LAW OFFICES OF FRANCESCO BENAVIDES

5 By: /s/ Francesco Benavides*
6 FRANCESCO BENAVIDES
7 **Authorized by email on July 26, 2024*
8 Attorneys for Plaintiff

9 Date: August 28, 2024

10 PHILIP A. TALBERT
11 United States Attorney
12 Eastern District of California

13 By: /s/ Caspar Chan
14 CASPAR CHAN
15 Special Assistant United States Attorney
16 Attorneys for Defendant

17 ORDER

18 APPROVED AND SO ORDERED

19 IT IS SO ORDERED.

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21 Dated: August 28, 2024

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23 JEREMY D. PETERSON
24 UNITED STATES MAGISTRATE JUDGE
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